Attachment B

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996	CC Docket No. 96-98

AFFIDAVIT OF JOHN B. MAYER
ON BEHALF OF AMERITECH

STATE OF ILLINOIS)
) **ss.**
COUNTY OF COOK)

I, John B. Mayer, being first duly sworn upon oath, do hereby depose and state as follows:

INTRODUCTION

1. My name is John B. Mayer. My business address is 2000 W. Ameritech Center Drive, Room 4C56, Hoffman Estates, IL 60196. I am employed by Ameritech and serve as the Director of Operational Competitive Readiness in the Network Services organization for the entire Ameritech region (Illinois, Indiana, Michigan, Ohio and Wisconsin). I have served in this capacity since March 1, 1996. I am responsible for managing the development of the operational processes and systems that support

the products and services of Ameritech's local exchange company ("LEC") subsidiaries, including interconnection, unbundled network elements and resale.

2. I received my Bachelor of Science degree in Physics and my Masters of Business Administration degree from Loyola University of Chicago in 1966 and 1971, respectively.

3. I began my telecommunications career in June 1966, when I joined the Network Maintenance organization of Illinois Bell Telephone Company ("Illinois Bell"). My responsibilities at that time included developing methods and procedures for the provisioning and maintenance of inside wire in large office buildings.

4. In November 1966, I entered the United States Army and was assigned as a Research Assistant in Thermodynamic Physics at the Nuclear Defense Laboratory at Edgewood Arsenal, Maryland.

5. I returned to Illinois Bell in December 1968 as a central office engineer. My responsibilities in that position included planning, ordering and monitoring the installation and removal of central office equipment. In 1970, I joined Illinois Bell's Chicago Planning Division, where I developed business cases relating to tandem office wire centers, materials management, and operator services systems and

facilities. In 1976, I moved to the Corporate Planning Department, where my duties included prioritization of network-related capital projects.

6. In July 1976, I accepted a position in the Construction Planning Department at AT&T in Basking Ridge, New Jersey. In that position, I was primarily responsible for developing the business case, including the underlying economics, associated with the accelerated replacement of electromechanical switching systems.

7. I returned to Illinois Bell in 1979, where I joined the Headquarters Staff organization and served as the subject matter expert on business cases using AT&T's CUCRIT analysis tool. In 1980, I accepted a position in the Business Installation and Maintenance ("I&M") Department, where I was responsible for the installation and maintenance of customer premises station equipment.

8. In 1981, I served on loan to AT&T's Product Management organization and was responsible for analyzing the profitability of customer premises equipment offerings in the Central Region. In May 1982, I returned to Illinois Bell in Network Operations, where I established and subsequently managed the first Special Services Center in Illinois.

9. In 1985, I accepted a position with Ameritech and served as an Executive Assistant to the Chairman of the Board. In this position, I also served as the first Executive

Director of the Commercial Club of Chicago's Information Industry Council, which was formed to stimulate job growth in the Chicago area. In addition, I served as a member of the Board of the Midwest Technology Development Institute, whose charter had a similar purpose.

10. In 1986, I rejoined Illinois Bell in its Support Services organization, where I was responsible for Automotive Operations, Administrative Services, Internal Mail Operations and Real Estate Design and Construction. In 1987, I transferred to the Distribution Services Department and managed all field installation and maintenance operations for the North Suburban Area of Chicago. I later became General Manager-Customer Services in the North Suburban Area. In this position, I was responsible for all Outside Plant Engineering, Construction, Installation, Maintenance and Switching operations. In 1993, I joined the Operations Department and managed all field installation and maintenance operations in Chicago and South Suburban areas. Since March 1, 1996, I have served in my current assignment as Director of Operational Competitive Readiness.

PURPOSE OF AFFIDAVIT

11. This affidavit responds to claims by AT&T and, to a lesser extent, MCI WorldCom, Sprint, and Qwest, that local switching must be provided on an unbundled basis because incumbent LECs allegedly cannot provision unbundled local loops quickly enough to allow competing local exchange carriers ("CLECs") to compete

effectively through self-provided switching.[1/] In particular, AT&T, in the affidavit of Mr. Pfau, contends that (1) incumbent LECs are unable to perform coordinated cut-overs for unbundled loops in quantities sufficient to support mass market entry by CLECs (Pfau Aff., ¶¶ 48-61) and (2) the incumbent's loop provisioning processes are ill-defined and error-prone. (Id., ¶¶ 62-70). These claims are unfounded and rest on speculation rather than facts. Ameritech has the processes and capacity to efficiently and reliably provision unbundled loops for CLECs at any reasonably foreseeable level of demand. Further, Ameritech's provisioning processes are anything but ill-defined and error-prone; to the contrary, they are well-established and well-documented based on years of experience.[2/] These processes are outlined in Ameritech's state commission-approved interconnection agreements. In addition, Ameritech provides CLECs with monthly reports on a variety of performance measures for loops provisioning. Thus, Mr. Pfau's assertions are baseless.

HOW LOCAL LOOPS ARE PROVISIONED

12. AT&T's Mr. Pfau contends that providing unbundled loops is an extremely complex process that can never be achieved successfully at high volumes. I disagree. To

---

[1/] AT&T Comments at 100-108 and Pfau Aff. at ¶¶ 34-81; MCI WorldCom Comments at 51-52; Sprint Comments at 32; Qwest Comments at 70-72.

[2/] This is not to say that Ameritech has stopped seeking to improve its processes. In fact, Ameritech is currently designing a joint trial with AT&T to find ways to improve the loop provisioning process. Should the trial reveal any ways of improving Ameritech's provisioning performance, they will be implemented into standard practice.

begin with, real-world experience belies Mr. Pfau's claim. CLECs have been rapidly installing switches (or leasing them from third parties) and connecting unbundled loops to them throughout the nation and Ameritech's region.[3/] At the same time, however, no CLEC has ordered unbundled local switching ("ULS") from Ameritech. Thus, all of the 185,000 unbundled loops that Ameritech has provisioned to CLECs as of May 1, 1999 were intended to be served by non-Ameritech switches. Moreover, CLECs have submitted forecasts to Ameritech indicating that they will need another 117,000 unbundled loops by the end of 1999, still without any carrier purchasing ULS. These marketplace facts completely undermine Mr. Pfau's claims about the impossibility of competing without ULS.

13. In addition, Ameritech has implemented procedures that enable it to provide unbundled loop transmission throughout its service territory on a timely, nondiscriminatory basis that gives reasonably efficient CLECs a meaningful opportunity to compete. These procedures include the necessary preordering, ordering, provisioning, billing, maintenance and repair procedures. In response to Mr. Pfau, this affidavit focuses on the coordinated cut-over provisioning process.

A. The Coordinated Loop Cut-Over Process

14. After Ameritech completes the facility assignment and design process for an unbundled loop order, the order is distributed to the required work groups.

[3/] See UNE Fact Report, Unbundled Local Switching at I-1 to I-3.

Ameritech's Network Element Control Center ("NECC") personnel then contact the CLEC to establish a coordinated cut-over schedule. Ameritech coordinates the scheduled conversion time with the CLEC at least forty-eight hours prior to the due date. Technicians in the NECC are the single point of contact for coordinating live service conversions between the CLEC and Ameritech field forces. These technicians are responsible for scheduling cut-over activities in a manner that minimizes end user out-of-service time.

15. At the scheduled conversion time, Ameritech frame technicians perform the coordinated cut-over of the requested loop(s) in the Ameritech central office. Loops terminate on Ameritech's Main Distribution Frame ("MDF"). A loop is unbundled and cut over to the CLEC by disconnecting it from its current frame location and installing a cross-connect to the CLEC's designated MDF location. This requires the running of "jumper" wires on the main frame, and in some cases on intermediate distributing frames, and removal of the jumper wire formerly used for that loop.

B. <u>Ameritech's Capacity for Coordinated Cut-Overs</u>

16. Mr. Pfau speculates that incumbent LECs do not have the capacity to process orders for unbundled loops at a sufficient level to support mass competitive entry. (Pfau Aff., ¶¶ 65-68). I strongly disagree. To begin with, the great bulk of the work in provisioning an unbundled loop order is completed electronically or through

specialized service centers (such as Ameritech's NECC). The only manual operations where Ameritech's capacity and accuracy in provisioning loops could even potentially affect a CLEC's ability to use its own switches — and the only function that Mr. Pfau discusses — are coordinated cut-overs.

17. Ameritech has more than enough capacity to efficiently and reliably complete coordinated cut-overs at any reasonably likely level of demand by CLECs. Moreover, should demand suddenly increase, Ameritech could augment its number of frame technicians to meet that demand in a relatively short period. Ameritech is fully willing and able to take any steps necessary to meet unexpected increases in CLEC demand.

18. Attached as Schedules 1 and 2 are charts showing Ameritech's current central office frame capacity to complete coordinated cut-overs and the capacity to do so if CLEC demand should increase. The charts list central office frame capacities for coordinated cut-overs in small, medium, and large central offices. The estimated monthly cut-over capacity at different staffing levels is listed for each office size. Schedule 1 shows Ameritech's current capacity, which it uses to provision about 170,000 unbundled loops per year. This capacity is based on the average number of frame technicians currently assigned to each size central office working a straight 40-hour week. Column 3 of Schedule 1 shows the incremental cut-over capacity

Ameritech would gain by having the same number of frame technicians work a 40-hour week plus two hours of overtime per day and six to eight hours on Saturdays.

19. Schedule 2 shows the cumulative incremental capacity (over current capacity with overtime from Schedule 1. Column 3) that Ameritech would gain to meet CLEC demand if it used additional frame technicians in each office (Columns 1 and 2). Column 3 shows the cumulative incremental capacity gained by having the incremental technicians work overtime as described above. Column 4 shows the cumulative incremental capacity gained if Ameritech went to a three-shift schedule with a full complement of frame technicians on each shift.

20. Schedule 2 assumes that additional frame technicians are hired to enlarge the workforce. New frame technicians can be trained in four weeks (assuming a minimum level of proficiency at the outset). If CLECs provide accurate advance forecasts of their unbundled loop needs, this gives Ameritech more than enough time to increase capacity if necessary.

21. Schedules 1 and 2 assume that each frame technician can run a jumper, on average, in 6.9 minutes. This figure is derived from Ameritech's Operations Activity Based Time Reporting System and jumper activity tracked in its Frame Operations Management System ("FOMS"). The figure, therefore, is based on actual work experience. Reducing each hour by 10% to account for miscellaneous work

activities, such as reading and closing out orders, the charts assume that a frame technician will actually run approximately 7.9 jumpers per hour (as opposed to 8.7 jumpers per hour if one were completed every 6.9 minutes). Assuming an eight-hour day, reduced by two fifteen-minute breaks, and 20.83 workdays per month (250 workdays/12 months), the charts assume that a frame technician can complete 1,230 loop cut-overs per month.

22. The 6.9 minute-per-jumper figure applies only to "non-coordinated" loops, i.e., new or additional lines, which do not involve transfers of existing services between Ameritech and the CLEC. "Coordinated" loops, which require placement of new jumpers and removal of old ones and coordination between the CLEC and NECC, take on average twice as long to cut over as non-coordinated loops. Accordingly, Schedules 1 and 2 estimate that each frame technician could complete 615 coordinated loop cut-overs per month (1,230 x 0.5). Thus, the numbers in Schedules 1 and 2 are extremely conservative, as they assume that all loops require the more time-consuming coordinated cut-overs.

23. Based on Ameritech's experience, frame activity can become counterproductive if more than four frame technicians are working on the same Main Distribution Frame ("MDF") at the same time. Therefore, the "incremental complement" of frame technicians shown in Column 1 of Schedule 2 is based on the number of MDFs in

each size central office. For example, a large central office could have four MDFs, so Schedule 2 assumes a maximum of 16 frame technicians working simultaneously.

24. Schedules 1 and 2 demonstrate that Ameritech, which is using current capacity both to complete CLEC loop orders in a timely fashion as required by its interconnection agreements and to handle all its own needs, can readily add incremental capacity in a number of ways and therefore is fully prepared to meet any conceivable level of CLEC demand.

25. First, Ameritech could have its current workforce put in overtime, which increases capacity by 40%, which translates into approximately 18% of all the lines in a large central office in a single year (1.49% x 12 months). (Schedule 1, Column 3). Assuming that Ameritech's own order levels remain constant (even though they might actually decrease as CLEC penetration increases), all of this incremental capacity could be used for CLEC cut-overs.

26. Second, Ameritech could assign more frame technicians to each MDF. This would increase capacity substantially without any decrease in productivity. For example, this enhanced workforce would allow Ameritech to cut over an incremental 32.4% to 44.7% of a large central office in a year, as compared to current capacity. (Schedule 2, Column 2) (2.71% x 12 = 32.4%; 3.73% x 12 = 44.7%).

27. Third, Ameritech could have this increased number of technicians work overtime, which would increase capacity another 40% for the incremental technicians and allow Ameritech to cut over an incremental 38.4% to 55.4% of the lines in a large central office in a single year, as compared to current capacity. (Schedule 2, Column 3) (3.2% x 12 = 38.4%; 4.62% x 12 = 55.4%).

28. Fourth, Ameritech could have a full complement of frame technicians assigned to three shifts per day, allowing it to cut over an entire large central office in less than a year. (Schedule 2, Column 4) (8.62% x 12 = 103.4%; 11.18 % x 12 = 134.1%).

29. These incremental capacities far exceed any forecast of CLEC demand for unbundled loops, and show that Mr. Pfau's allegations of insufficient capacity are groundless.

ADEQUACY OF PROVISIONING PROCESSES

30. Although he does not refer to Ameritech, Mr. Pfau labels all incumbent LECs as having inadequate processes for provisioning local loops. (Pfau Aff. ¶¶ 48-61). This claim has no factual basis. As a threshold matter, one must remember that Ameritech has been providing unbundled loops since before the 1996 Act took effect and therefore has a great deal of experience in this area. Since passage of the 1996 Act, Ameritech has offered and provided a full range of unbundled loops through its

interconnection agreements. As of May 1, 1999, Ameritech had provisioned 185,092 unbundled loops to CLECs region-wide. In addition, based on CLEC forecasts, Ameritech expects to provision another 117,000 unbundled loops by the end of 1999, an increase that, as explained above, is well within Ameritech's provisioning capacity. (Notably, no CLEC has said it will order unbundled local switching from Ameritech in 1999, meaning that the CLECs plan to serve all of these additional loops through self-provided or third-party switches).[4/]

31. The intervals and processes for provisioning loops are largely established in Ameritech's state commission-approved interconnection agreements. Ameritech's interconnection agreements, for example, require the following average intervals for loops where no field dispatch and/or conditioning is necessary:

Non-DS1 Unbundled Loop - Standard Intervals:

Volume	Interval
1 - 24	5 business days
25 - 48	6 business days
49 - 96	7 business days
97 or more	negotiated

[4/] Of course, CLEC forecasting plays an important role in Ameritech's ability to provision unbundled loop orders in a timely manner. Ameritech can prepare only for the work volumes it can reasonably expect to occur. This is done by forecasting work volume based upon forecasts received from CLECs and assigning the appropriate level of workforce to meet the forecast. To the extent that the forecasts Ameritech obtains from requesting carriers are not accurate, Ameritech cannot assign the appropriate level of work force to complete the required work on a timely basis. This situation is exacerbated if the CLEC provides no forecast at all.

32. The interconnection agreements also impose a number of other intervals and requirements, such as providing a Firm Order Confirmation ("FOC") within 48 hours of receiving a CLEC order and coordinating the conversion date and time with the CLEC at least 48 hours in advance of cut-over.

33. Ameritech also provides all CLECs that purchase unbundled loops with monthly performance reports. These reports show, inter alia, the loop reject notice interval (how quickly Ameritech notifies the CLEC when an order must be rejected), the average interval for providing a FOC, the percentage of loop orders rejected, due dates not met, and installation trouble reports (the percentage of loops with trouble reported within 7 days of conversion).

34. Should these performance reports show that Ameritech is not meeting its contractual obligations, the interconnection agreements provide for escalation procedures and other remedies, such as automatic credit allowances. And, of course, CLECs also may pursue any available remedies before courts or regulators.

35. Mr. Pfau acts as if the specificity of loop provisioning requirements should count against incumbent LECs because an error at any stage could slow down the process. (Pfau Aff. ¶¶ 43-47). In truth, of course, specific, well-established and well-documented procedures, such as Ameritech's, help all parties track the process more closely and improve it where possible.

CONCLUSION

36. In sum, Ameritech has a well-established process for provisioning unbundled loops in a timely, reliable manner and the capacity to quickly and accurately process any reasonably likely level of CLEC orders for unbundled loops. Thus, the ability of CLECs to obtain unbundled loops is not any barrier to CLECs competing through self-provided or third-party switches.

SCHEDULE 1

CENTRAL OFFICE FRAME CAPACITY — COORDINATED LOOPS CURRENT CAPACITY

	(1) Current Complement of Frame Technicians	(2) Current Office Capacity (Loops Per Month)	(3) Incremental Capacity With Overtime (Loops Per Month and Incremental % of Office Per Month)
Large Offices (50,000 - 165,000 lines)	3 - 10	1,840 - 6,150	740 - 2,460 (1.48% to 1.49%)
Medium Offices (15,000 - 50,000 lines)	1 - 3	620 - 1,840	240 - 740 (1.60% to 1.48%)
Small Offices (400 - 15,000 lines)	0.2 - 1	120 - 620	50 - 240 (12.5% to 1.60%)

Note 1: Offices defined as large usually contain more than one switch and may contain more than one MDF, which is one reason why more frame technicians are assigned to them and can perform coordinated cut-overs at the same time.

Note 2: The numbers of loops set forth herein are actually quite conservative, in that the Schedule assumes frame technicians spend all their time on "coordinated" loops, when in fact they also complete "non-coordinated" orders, which take only about half as long.

Note 3: Adding overtime work actually increases total capacity by 40%. The percentages in Column 3 show how that 40% increase translates into the additional percentage of lines in the entire central office that can be cut over each month, as compared to current capacity.

SCHEDULE 2

CENTRAL OFFICE FRAME CAPACITY — COORDINATED LOOPS CUMULATIVE INCREMENTAL CAPACITY

	(1) Incremental Complement of Frame Technicians	(2) Incremental Office Capacity (Loops Per Month and Incremental % of Office Per Month)	(3) Incremental Capacity Plus Overtime (Loops Per Month and Incremental % of Office Per Month)	(4) Three-Shift Capacity (Loops Per Month and Incremental % of Office Per Month)
Large Offices (50,000 - 165,000 lines)	1 - 6	1,350 - 6,150 (2.71% to 3.73%)	1,600 - 7,620 (3.2% to 4.62%)	4,310 - 18,450 (8.62% to 11.18%)
Medium Offices (15,000 - 50,000 lines)	3 - 1	2,080 - 1,350 (13.9% to 2.71%)	2,820 - 1,600 (18.8% to 3.2%)	5,530 - 4,310 (36.9% to 8.62%)
Small Offices (400 - 15,000 lines)	1.8 - 3	1,160 - 2,080 (290% to 13.9%)	1,600 - 2,820 (400% to 18.8%)	2,960 - 5,530 (740% to 36.9%)

Note 1: Offices defined as large usually contain more than one switch and may contain more than one MDF, which is one reason why more frame technicians are assigned to them and can perform coordinated cuts at the same time.

Note 2: The numbers of loops set forth herein are actually quite conservative, in that the Schedule assumes frame technicians spend all their time on "coordinated" loops, when in fact they also complete "non-coordinated" orders, which take only about half as long.

Note 3: The percentages given in Columns 2-4 show the cumulative additional percentage of total lines in the central office that could be cut over each month, as compared to current capacity.

I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

John B. Mayer, Jr.
John B. Mayer

Subscribed and sworn to before
me this 9th day of July, 1999.

Barbara L. Baker
Notary Public

My Commission expires 7/22/2001

"OFFICIAL SEAL"
Barbara L. Baker
Notary Public, State of Illinois
My Commission Expires 7/22/2001